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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit  
 corporation, LAURA LEIGH, individually, and  
 WILD HORSE EDUCATION, a nonprofit  
 corporation,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF THE  
 INTERIOR, BUREAU OF LAND  
 MANAGEMENT, and JON RABY, Nevada  
 State Director of the Bureau of Land  
 Management,

*Federal Defendants.*

Case No. 2:22-cv-01200-CDS-BNW

**JOINT STATUS REPORT**

Per the parties' Joint Status Report filed on December 20, 2024, ECF No. 91, Federal Defendants and Plaintiffs submit this joint status report on the status of Federal Defendants' evaluation of Plaintiffs' request for attorney's fees and the parties' efforts to obtain the necessary approvals for their settlement agreement in principle to resolve Plaintiffs' First Amendment

1 claim (Sixth Cause of Action) that the Court referred to mediation in its Order on summary  
2 judgment. *See* ECF No. 79 at 39.<sup>1</sup>

3 On December 16, 2024, Plaintiffs provided their billing records to Federal Defendants in  
4 connection with their request for attorneys' fees and costs. Within the next couple weeks, Federal  
5 Defendants expect to provide a response and counterproposal to Plaintiffs' fees request as well  
6 as a proposed draft settlement agreement memorializing the terms of the parties' settlement  
7 agreement in principle to resolve Plaintiffs' First Amendment claim (Sixth Cause of Action).  
8 Once the parties reach a tentative agreement on the resolution of Plaintiffs' fees request and the  
9 language of the settlement agreement, Federal Defendants will be able to begin their approval  
10 process, under which appropriate officials at BLM and DOJ must review and approve the  
11 agreement.  
12

13 In light of the estimated time needed for the parties to continue their settlement  
14 discussions and for Federal Defendants to obtain the necessary approvals during a time of  
15 leadership transition at BLM and DOJ, the parties plan to file another joint status report by  
16 **February 28, 2025**, if they have not filed a settlement agreement by that date.  
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18  
19 Dated: January 21, 2025

Respectfully Submitted,  
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26 <sup>1</sup> Please note that Federal Defendants do not currently have authorization to enter a settlement  
27 agreement and, in the event that the parties reach an agreement, such agreement is subject to the  
28 review and approval of the appropriate officials at the Bureau of Land Management ("BLM")  
and the United States Department of Justice ("DOJ").

LISA LYNNE RUSSELL, Deputy Assistant Attorney General  
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/s/ Jessica L. Blome  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 21, 2025, I filed the foregoing Joint Status Report electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz  
Michelle M. Spatz  
U.S. Department of Justice